REMARKS

Reconsideration and allowance of this application, as amended, is respectfully requested.

This Amendment is in response to the Office Action dated July 2, 2009.

By the present amendment, the claims have been amended in response to the claim objections set forth on page 2 of the Office Action. Therefore, reconsideration and removal of the claim objections is respectfully requested.

Reconsideration and removal of the 35 USC §102(b) rejection of claims 31, 32, 34, 35, 43, 44, 46 and 47 as being anticipated by Machida (USP 4,848,536) and the 35 USC §103 rejection of claims 33, 37, 41 and 45 over the combination of Machida and Motoaki (JP 6-221363) and the 35 USC §103 rejection of claims 36 and 48 as being obvious over the combination of Machida and Hiramatsu (USPub. 2003/0044653) is also respectfully requested.

In essence, all of the rejections are based on the Examiner's interpretation of Machida as summarized in paragraphs [0006] and [0007] on pages 2 and 3 of the Office Action. Specifically, these sections state the Examiner's view that:

1) Fig. 6 of Machida shows a rectangular substrate, thereby meeting the limitation found in all of the claims of the present application requiring a rectangular substrate; and

2) that Figs. 15D and 15E are cross-sections of the electrodes in Machida "obtained with horizontal cut-through."

Applicants again respectfully traverse this interpretation of Machida, and request that the Examiner reconsider this interpretation in light of the following remarks. Following the Examiner's review of this matter, it is requested that the Examiner contact the undersigned attorney for purposes of further discussing this matter if, after such consideration, the Examiner still continues to believe that Machida teaches the

above two points. Applicants and the undersigned attorney greatly appreciate the Examiner's consideration in this regard.

I. The Question of Whether Machida Teaches a Rectangular Substrate

In the Office Action, as noted above, it is argued that Machida illustrates a substrate 6 in Fig. 6 which is rectangular. Interestingly, Fig. 6 shows the substrate 6 with cross-sectional lines, clearly indicating that Fig. 6 is, in fact, a cross-section of a substrate. Therefore, from Fig. 6, it is impossible to determine whether the substrate would actually be rectangular, square or circular. The fact that Fig. 6 is a cross-sectional view is clearly stated in column 2, lines 61 et seq. of Machida which states:

> "Fig. 6 schematically illustrates that a sectional side view of an embodiment of the present invention. "

As such, viewing Fig. 6 alone, as noted above, it is actually not clear what the shape of the substrate 6 is.

However, Fig. 7 clarifies the shape of the substrate as being round. This is quite clear because Fig. 7 shows that the substrate 6 is, in fact, round. Further, column 2, lines 63 and 64 of Machida state:

> "Fig. 7 schematically illustrates a plan view of an embodiment of the present shown in Fig. 6."

Therefore, quite clearly, Fig. 6 is nothing more than a cross-sectional view of Fig. 7, in which the round substrate 6 shown in Fig. 7 is shown in a hatched cross-sectional form. Therefore, it is respectfully submitted that, quite contrary to the statement made in the Office Action in paragraph 6, Fig. 6 of Machida does not serve as a teaching of a rectangular substrate, as required by the present claims.

With regard to the second part of paragraph 6 on page 3 of the Office Action, it is stated that:

> "Please note that none of the drawings of the current application shows the rectangular substrate except side view of substrate (G) (cross-section view) as shown in Figs. 1 and 2; Therefore, Machida's substrate (element 6 in Fig. 6) reads the claim limitation."

Applicants respectfully submit that this is completely incorrect. In the first place, the description of the substrate G illustrated in Figs. 1 and 2 makes it clear that it is a rectangular substrate. In particular, for example, paragraph [0024] specifically defines the length and width of the substrate G, which clearly are dimensions of a rectangle.

Further, Fig. 5 of the drawing also shows the substrate G, specifically mounted on the bar-like electrodes 40. Regarding Figs. 4-6, paragraph [0024] describes a rectangular glass substrate measuring 1100mm by 1300mm fitted to the electrostatic chuck 10 (shown in a rectangular shape in Fig. 4) which is sized to be 1120mm by 1300mm to specifically hold the rectangular substrate G shown in Fig. 5. Therefore, it is very clear from the specification that the substrate G shown in Figs. 1, 2 and 5 of the specification is, in fact, rectangular.

Further, it is respectfully submitted that the mere fact that the drawings of the present application do not actually show a plan view of the described rectangular substrate has absolutely nothing to do with Machida's description of the element 6 in Fig. 6. As noted above, Fig. 6 of Machida is clearly and explicitly described by Machida as a cross-sectional view, not a plan view. The plan view, Fig. 7 of Machida clearly shows that Machida's substrate 6 is circular. As such, the fact that the present application does not illustrate the rectangular substrate G as a rectangle has absolutely no bearing on Machida's very clear description of his round substrate.

For the reasons set forth above, it is respectfully requested that the Examiner very carefully consider his interpretation of Machida's substrate 6, and, after this consideration, remove the interpretation that Machida's substrate 6 is a rectangle.

Further, since all of the claims of the present application require a rectangular substrate, it is respectfully submitted that the 35 USC §102 and §103 rejections based on Machida be removed.

II. The Question of Whether Figs. 15D and 15E of Machida Are Cross-Sectional Views of Electrodes.

In paragraph 7 of the Office Action, page 3, the Examiner states that Figs. 15D and 15E of Machida are cross-sections "obtained with horizontal cut-through." Applicants respectfully submit that this is clearly completely contrary to what Machida actually does, in fact, show and describe.

In the first place, it is noted that Machida uses hatching lines, in accordance with USPTO procedures, every time he intends to illustrate something as a sectional view. From this, it is clear in Machida that Figs. 4, 6, 8(A), 13 and 14 are sectional views. These figures, using hatch lines, are also described as sectional views. These figures, using hatch lines, are also described as sectional views. In Fig. 15, on the other hand, there is absolutely no indication of any hatching lines in any of Fig. 15A-15E, and there is no description provided in the specification that any of these are sectional views.

Quite to the contrary, the Examiner is requested to carefully read column 7, line 46 through column 8, line 43, which clearly describes that Figs. 15A – 15E are plan view, not sectional views. For example, column 7, line 51 et seq., states:

> "the electrode configuration in Fig. 15(A) where each rectangular represents a planar electrode 1-1, 1-2, and so on."

The description of Fig. 15B describes how the round wafers shown therein are moved along the electrodes. Obviously, from the view of the round wafers in Fig. 15B, this figure is a planar view.

From column 8, line 5 et seq., it is clear that Figs. 15C and 15D simply represent other planar examples of electrode structure for moving the wafers, which is the whole purpose of the illustration in Fig. 15. In particular, the description regarding Fig. 15(D) is that:

> "Fig. 15(D) is for a curved course, without any acceleration or deceleration toward the direction of transportation, where the wafer is guided to maintain the curved travel course."

In other words, in comparing Fig. 15(B), which shows the wafers moving, with Fig. 15(D), which describes a curved course, it is quite clear that what Fig. 15(D) is intended to show is a planar view of how an electrode can be structured to move the wafers along a curved path.

Similarly, Fig. 15(E) is described as:

> "Figs. 15(E) is for orthogonally branching the course of wafer transportation. (column 8, line 19 et seq.)"

Once again, looking at Fig. 15(E), showing a cross construction, it is clear from the description that this is intended to provide a orthogonal branching arrangement that this is intended to move wafers, such as shown in Fig. 15(B), in orthogonal directions. Once again, it is quite clear that Fig. 15(E) is a planar view, not a cross-sectional view.

Accordingly, it is respectfully requested that the Examiner also carefully reconsideration his interpretation of Figs. 15(D) and 15(E). It is submitted that, upon such a careful consideration, particularly including the above comments, it will be clear that Figs. 15(D) and 15(E), like Fig. 15(B), clearly show a planar view, not a cross-sectional view. This being the case, these figures do not teach or suggest the claimed relationship between the sides of a rectangular substrate and the short sides of the electrodes.

If the Examiner believes that there are any other points which may be clarified or otherwise disposed of either by telephone discussion or by personal interview, the Examiner is invited to contact Applicants' undersigned attorney at the number indicated below.

To the extent necessary, Applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to the Antonelli, Terry, Stout & Kraus, LLP Deposit Account No. 01-2135 (Docket No. 1113.45730X00), and please credit any excess fees to such deposit account.

Respectfully submitted,
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